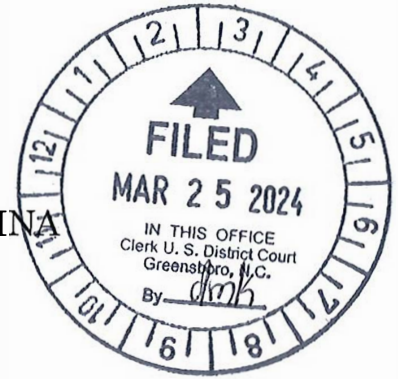


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :

v. :

BRANDON DRELLE WALL :

1:24CR 99 -1

WILLIAM CHAVIS DUNLAP, JR. :

1:24CR 99 -2

The Grand Jury charges:

COUNT ONE

1. At all times material to this Indictment, Fish Hut Arcade, located at 3500 South Main Street, Winston-Salem, North Carolina, was engaged in the sale of internet business, an industry which affects interstate and foreign commerce.

2. On or about June 22, 2022, in the County of Forsyth, in the Middle District of North Carolina, BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., did knowingly and unlawfully take and obtain property, consisting of United States currency, belonging to Fish Hut Arcade, located at 3500 South Main

Street, Winston-Salem, North Carolina, from the possession of an employee of the said business against her will by means of actual and threatened force, violence, and fear of injury, to her person; in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

On or about June 22, 2022, in the County of Forsyth, in the Middle District of North Carolina, BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as more fully referenced in Count One of this Indictment, did knowingly carry and use, by brandishing, a firearm; in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THREE

On or about June 22, 2022, in the County of Forsyth, in the Middle District of North Carolina, WILLIAM CHAVIS DUNLAP, JR., knowingly did possess in and affecting commerce a firearm, that is, a Taurus 9mm handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FOUR

1. At all times material to this Indictment, Mega 1, located at 264 Liberty Plaza in Liberty, North Carolina, a sole proprietorship, was engaged in the sale of internet business, an industry which affects interstate and foreign commerce.

2. On or about August 5, 2022, in the County of Randolph, in the Middle District of North Carolina, BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., did knowingly and unlawfully take and obtain property, consisting of United States currency, belonging to Mega 1, located at 264 Liberty Plaza in Liberty, North Carolina, from the possession of employees of the said business against their will by means of actual and threatened force, violence, and fear of injury, to the person of the employees; in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

On or about August 5, 2022, in the County of Randolph, in the Middle District of North Carolina, BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, interference

with commerce by robbery, as more fully referenced in Count Four of this Indictment, did knowingly carry and use, by brandishing, a firearm; in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SIX

On or about August 5, 2022, in the County of Randolph, in the Middle District of North Carolina, BRANDON DRELLE WALL knowingly did possess in and affecting commerce a firearm, that is, a Ruger 5.7x28mm handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and with knowledge of that conviction; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT SEVEN

1. At all times material to this Indictment, Refuel Operating Company, located at 804 N. U.S. Highway 220, Rockingham, North Carolina, was engaged in the general gas station/convenience store business, an industry which affects interstate and foreign commerce.

2. On or about August 18, 2022, in the County of Richmond, in the Middle District of North Carolina, BRANDON DRELLE WALL did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that BRANDON DRELLE WALL did knowingly and unlawfully take and obtain property, consisting of United

States currency, belonging to Refuel Operating Company in Rockingham, North Carolina, from the possession of employees of the said business against their will by means of actual and threatened force, violence, and fear of injury, to the person of the employees; in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT EIGHT

On or about August 18, 2022, in the County of Richmond, in the Middle District of North Carolina, BRANDON DRELLE WALL, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as more fully referenced in Count Seven of this Indictment, did knowingly carry and use, by brandishing, a firearm; in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses alleged in Counts One through Seven of this Indictment, the defendants, BRANDON DRELLE

WALL and WILLIAM CHAVIS DUNLAP, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), all right, title and interest in and to any firearm or ammunition involved in or used in the commission of the offenses.

3. Upon conviction of one or more of the offenses alleged in Counts One, Three, and Five of this Indictment, the defendants, BRANDON DRELLE WALL and WILLIAM CHAVIS DUNLAP, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, or a conspiracy to commit such offenses.

4. The property subject to forfeiture pursuant to paragraphs 2 and 3 above may include, but shall not be limited to, the following:

- a. Ruger, Model 57, 5.7x28mm caliber semiautomatic pistol bearing serial number 642-02198;
- b. Bear Creek Arsenal, Model BCA15, 7.62x39mm caliber semiautomatic pistol bearing serial number 63602;
- c. Glock, Model 19, 9x19mm caliber semiautomatic pistol bearing serial number BLCH922;
- d. Zigana, Model PX-9, 9mm caliber semiautomatic pistol bearing serial number T062021BM12201;

- e. Palmetto State Armory, Model PA-15 300 Blackout caliber semiautomatic pistol bearing serial number PA060236;
- f. American Tactical, Model Mil Sport, 5.56mm caliber semiautomatic pistol bearing serial number MSA 100039;
- g. Brown bolt action, .22 caliber rifle;
- h. multiple magazines; and
- i. cannisters containing various rounds of ammunition.

5. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant cannot be located upon the exercise of due diligence, has been transferred or sold to or deposited with a third person, has been placed beyond the jurisdiction of the Court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in accordance with Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 924(d), Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: March 25, 2024

SANDRA J. HAIRSTON

United States Attorney


BY: MARY ANN COURTNEY
Special Assistant United States Attorney

A TRUE BILL:


FOREPERSON